

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**



**FILED**  
9-15-16  
04:59 PM

Application of Pacific Gas and Electric  
Company for Approval of the Retirement of  
Diablo Canyon Power Plant, Implementation of  
the Joint Proposal, And Recovery of Associated  
Costs Through Proposed Ratemaking  
Mechanisms (U39E)

Application 16-08-006  
(Filed August 11, 2016)

**RESPONSE OF SOUTH SAN JOAQUIN IRRIGATION DISTRICT**

Vidhya Prabhakaran  
Emily P. Sangi  
DAVIS WRIGHT TREMAINE LLP  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111-6533  
Telephone: (415) 276-6500  
Facsimile: (415) 276-6599  
E-mail: vidhyaprabhakaran@dwt.com  
Email: emilysangi@dwt.com

September 15, 2016

Attorneys for South San Joaquin Irrigation  
District

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of Pacific Gas and Electric  
Company for Approval of the Retirement of  
Diablo Canyon Power Plant, Implementation of  
the Joint Proposal, And Recovery of Associated  
Costs Through Proposed Ratemaking  
Mechanisms (U39E)

Application 16-08-006  
(Filed August 11, 2016)

**RESPONSE OF SOUTH SAN JOAQUIN IRRIGATION DISTRICT**

Pursuant to Rule 2.6(a) of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, South San Joaquin Irrigation District (“SSJID”) respectfully submits this response to Pacific Gas and Electric Company’s (“PG&E”) Application for Approval of the Retirement of Diablo Canyon Power Plant (“Diablo Canyon”), Implementation of the Joint Proposal, and Recovery of Associated Costs through Proposed Ratemaking Mechanisms (“PG&E Application”).

**I. INTRODUCTION**

SSJID is a special district formed in May 1909 pursuant to the Wright-Bridgford Act, the predecessor of the California Water Code, for the purpose of providing a reliable, economic source of irrigation water for the cities of Escalon, Ripon and Manteca, and portions of unincorporated San Joaquin County. SSJID is currently an electric customer of PG&E and Modesto Irrigation District, and its service territory includes approximately 38,000 PG&E accounts. Special Districts in California are local units of government established by the residents of an area to provide a service not offered by a county or city. SSJID operates under the direction and control of its Board of Directors, the members of which are elected by, and ultimately answerable to, the voters in the district. SSJID currently provides irrigation services to approximately 3,100 customer accounts within its service area; wholesale treated water to the

cities of Tracy, Escalon, Manteca, and Lathrop; raw water to the City of Ripon; and through its ownership interest in hydroelectric generating facilities, wholesale electric service.

SSJID is seeking to expand the scope of the services it provides to include retail electric service within its existing service territory. SSJID intends to do so by acquiring certain existing electric distribution facilities currently used by PG&E in order to provide significant public benefits including gaining local control, transparency and accountability over retail electrical distribution in SSJID's territory; discounted electric rates; more localized public benefits program spending; increased emphasis on the local system's reliability with goals of maintaining existing and improving long-term reliability; and stimulus to the local economy through customer savings and job creation. SSJID thus has a significant interest in this proceeding as a potential future competitor of PG&E that will be responsible for departing load from PG&E's service territory.

## **II. SSJID'S PARTICIPATION IN THIS PROCEEDING WILL BE TO CONFIRM THAT THE JOINT PROPOSAL DOES NOT IMPACT MUNICIPAL DEPARTING LOAD**

On its face, the Joint Proposal to retire Diablo Canyon and replace it with a portfolio of greenhouse gas ("GHG")-free resources appears to have no impact on municipal departing load ("MDL"). Thus, under the Joint Proposal, PG&E would not impose any additional costs on departing load customers who are not PG&E electric distribution customers. SSJID will support any such approach. SSJID intends to participate in this proceeding and to conduct limited discovery primarily in order to confirm that the Joint Proposal does not impose any additional costs on MDL. To the extent SSJID does not assert an issue with the Joint Proposal at this time, SSJID does not waive its right to pursue or object to any issue that may affect its interests as SSJID uncovers during the course of this proceeding.

### **III. SERVICE**

All pleadings and other communications in connection with this proceeding should be served as follows:

Vidhya Prabhakaran  
Emily P. Sangi  
Davis Wright Tremaine LLP  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111-6533  
Telephone: (415) 276-6500  
Facsimile: (415) 276-6599  
E-mail: vidhyaprabhakaran@dwt.com  
Email: emilysangi@dwt.com

Attorneys for South San Joaquin Irrigation District

### **IV. RULE 2.6(D) REQUIREMENTS**

SSJID has no objections regarding PG&E's statement on the proposed category, need for hearing, issues to be considered, or proposed schedule.

Respectfully submitted,

/s/  
Vidhya Prabhakaran  
Emily P. Sangi  
DAVIS WRIGHT TREMAINE LLP  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111-6533  
Telephone: (415) 276-6500  
Facsimile: (415) 276-6599  
E-mail: vidhyaprabhakaran@dwt.com  
Email: emilysangi@dwt.com

Attorneys for South San Joaquin Irrigation  
District

September 15, 2016